

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

LERROY KEMP,)	CIVIL NO. 03-00419 SOM-KSC
)	
Plaintiff,)	
)	
vs.)	VOLUME I: Pgs. 1 - 311
)	
DR. SISAR PADERES, NURSE NEAL,)	
NURSE NUNEZ,)	
)	
Defendants.)	

DEPOSITION OF LAUREEN KONG
UPON WRITTEN QUESTIONS

Taken by and on behalf of the Defendants DR. SISAR PADERES and
"NURSE NEAL" HAYASE, at the office of: QUEEN'S MEDICAL CENTER
1301 Punchbowl Street, Honolulu, Hawaii, 96813, commencing at
8:50 O'CLOCK A.M. on THURSDAY, OCTOBER 7, 2004, pursuant to
Federal Rules of Civil Procedure.

MEDICAL
RECORDS OF:

(1992 - PRESENT)
OBTAINED FROM:

LERROY KEMP

QUEEN'S MEDICAL CENTER

BEFORE: CANDACE L. LEONG, NOTARY PUBLIC, STATE OF HAWAII
Phyllis K. Kushiner, CSR NO. 147, State of Hawaii

HONOLULU REPORTING SERVICES
SUITE 401 - 1000 BISHOP STREET
HONOLULU, HAWAII 96813
Telephone Number: 524-6288

EXHIBIT "C"

STATE OF HAWAII)
) SS.
CITY AND COUNTY OF HONOLULU)

1 I, CANDACE L. LEONG, a Notary Public in and for the
2 State of Hawaii, do hereby certify:

3 That on THURSDAY, OCTOBER 7, 2004,
4 at 8:50 o'clock A.M., appeared before me the witness,
5 LAUREEN KONG, whose deposition is contained
6 herein; that prior to being examined upon written interroga-
7 tories, the witness was by me duly sworn;

8 I, PHYLLIS K. KUSHINER, C.S.R., Commission Number
9 147, in and for the State of Hawaii, do hereby certify:

10 That the same were taken under my direction and
11 control and was thereafter reduced to typewriting under my
12 supervision; that the foregoing represents, to the best of
13 my ability a correct transcript of the deposition had at
14 the time in the foregoing matter;

15 That the reading and signing of this deposition
16 were waived by the said LAUREEN KONG, and
17 the deposition is therefore kept on file without signature
18 pursuant to Court Rules.

19 We further certify that we are not counsel for any
20 of the parties hereto, nor in any way interested in the
21 outcome of the cause named in the caption.

22 Dated this 7th day of OCTOBER 2004,
23 in HONOLULU, Hawaii.

24 Candace L. Leong
CANDACE L. LEONG
Notary Public, State of Hawaii
My commission expires:
25 2/17/2006

Phyllis K. Kushiner
PHYLLIS K. KUSHINER
Notary Public, State of Hawaii
C.S.R., Commission No. 147
My commission expires:
4/24/2007

KEMP, LEROY
03/07/57

DATE	PRIMARY CARE
MAY 24 1996	<p>O- (W) 166.6 (P) 97.4 (BP) 116/72</p> <p>S-P: State 1993 he fell off the pole & hurt his (L) knee. He saw Dr. from California & was told that he tore 10 ligaments. suggested a knee surgery. but refused. scared. Now it's giving him problem.</p> <p>90 swollen knee, pain started 4 days ago.</p> <p>H. went to ER 5/20/96, X-ray was done.</p> <p>USM</p>
<div style="border: 1px solid black; padding: 5px;"> <p>PHYSICIAN'S ORDERS</p> <p>Lab: _____</p> <p>X-Ray: _____</p> <p>Rx: _____</p> <p>Other: _____</p> <p>Return: _____</p> </div>	
MAY 31 1996	PRIMARY CARE

5/28/96 PCC PROGRESS NOTE

KEMP, LEROY 44-20-42

Case discussed with Dr. Bogden

TEMP PROB: LEFT KNEE PAIN

S: 40-year old with history of fall in 1993 off a telephone pole when his left knee extended forward 90°. However, there was no fracture noted. Then, patient refused surgery. He just recently went to the ER on Monday, 5/19, because of left knee swelling where he received Ibuprofen. X-ray was done and showed no evidence of fracture. He had partial relief with Ibuprofen and ice. Upon presentation, the left swelling has decreased since he started a week ago and with decreased tenderness. Otherwise, denies recent trauma associated with the current symptoms, no evidence of promiscuity, no IVDA. He did have mild fever and chills 1 day prior to today's visit. Pain lasted approximately 1 hour. Patient did state he has been doing a lot of walking since being here in Hawaii.

O: VS: As above.

Knees: Positive tenderness with medial collateral ligament with inward lateral movement of the knee joint causing tenderness at the medial region. Also, _____ of motion of the tibia backward pressure at the knee joint caused tenderness. However, there is no limited range of motion. Negative erythema, tenderness, warmth to touch. Positive mild evidence of effusion. Patella with range of motion within normal limits.

A: Left knee ligament inflammation s/p previous injury, probably secondary to increased walking and pressure on the knee. Discussed the option of surgery and patient agrees at this point that if necessary, he will go through surgery.

The Queen's Medical Center
Honolulu, Hawaii 96813

D I A G N O S T I C I M A G I N G C O N S U L T A T I O N

Patient Name: KEMP, LEROY W
Sex: M DOB: 7-Mar-57

MFID: 44-20-42
Patient Loc: EMR

DOCTOR EMERGENCY-ROOM
EMERGENCY ROOM DOCTOR
1301 PUNCHBOWL ST
HONOLULU

HI 96813-2499

Exam: 899135 Date: 20-May-96 Requested by: WONG, NORBERT B., M.D.
KNEE, ROUTINE 22008056 /LEFT

Diagnosis:

LT KNEE PAIN

History:

CLiQ Requisition Number: I141-0128 CLiQ Order Number: 3.01
IND:R/O FRACTURE

Three views of the left knee without comparison. Small suprapatellar effusion. Beaking of the tibial spines with preservation of the joint space on these nonweight bearing views. There is minimal subchondral sclerosis of the medial femoral condyle. No evidence of fracture or osseous, intra-articular loose body.

IMPRESSION:

1. MILD DEGENERATIVE JOINT DISEASE WITHOUT SIGNIFICANT JOINT SPACE NARROWING.
2. MEDIAL FEMORAL CONDYLE SCLEROSIS.
3. IF THERE IS CONCERN FOR INTERNAL DERANGEMENT OR AVASCULAR NECROSIS, MRI WOULD BE MORE SENSITIVE.

Dictated by:

Joan A. Kendall, M.D. 

Transcribed on: 22-May-96 3:28 PM by Darla Kaili

M E D I C A L R E C O R D C O P Y

057